



EPA's Proposed Greenhouse Gas Reporting Rule for Carbon Dioxide Injection and Geologic Sequestration

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Any communication on the greenhouse gas reporting program is intended to provide general and administrative information. This communication does not provide legal advice and responses to questions received do not have legally binding effect.

Outline



- GHG Reporting Program
- Proposed GHG Reporting Rule for Carbon Dioxide Injection and Geologic Sequestration
- Public comment

Background on Greenhouse Gas (GHG) Reporting Program



- Program established Oct 2009 pursuant to Clean Air Act authority
- Provides GHG data to inform future programs and policies
- No control of GHGs required under this Program

EPA's Proposal for CO₂ Injection and GS Reporting: Introduction



- EPA proposed reporting mechanisms for facilities that inject carbon dioxide (CO₂) underground, such as for enhanced oil and gas recovery (ER) and for long-term geologic sequestration (GS)
 - Proposal published in Federal Register April 12, 2010
 - 60 day comment period ended June 11, 2010
- Focuses on monitoring strategies for quantifying the amount of sequestered CO₂
- Relationship to other EPA rulemakings:
 - The proposal is complementary to and builds on EPA's proposed Underground Injection Control (UIC) Class VI requirements for GS wells promulgated under the authority of the Safe Drinking Water Act

EPA's Proposal for CO₂ Injection and GS Reporting: Overview



- EPA proposed a measured, tiered approach
- Tier 1: EPA proposed that all facilities that inject CO₂ underground would be required to report basic information on the amount of CO₂ received onsite, source of the CO₂ (if known), and the amount of CO₂ injected
- Tier 2: In addition to the reporting requirements listed above, EPA proposed that facilities that conduct geologic sequestration would be required to:
 - Develop and implement an EPA approved site-specific monitoring, reporting, and verification (MRV) plan
 - Report the amount of CO₂ geologically sequestered using a mass balance approach
- EPA proposed that facilities injecting CO₂ underground for ER or GS R&D would be required to report the Tier 1 basic information, and could choose to opt-in to the Tier 2 GS reporting requirements

EPA's Proposal for CO₂ Injection and GS Reporting: Overview (cont'd)



- Information obtained under this rule would enable EPA to monitor the growth and efficacy of GS (and therefore CCS) as a GHG mitigation technology over time and to evaluate relevant policy options
- EPA would also be able to reconcile information obtained under this rule with information obtained from subpart PP of the GHG Reporting Program (reporting requirements for CO₂ suppliers)
 - During the public comment period on subpart PP, EPA received comments that CO₂ end use should be considered in the GHG Reporting Program
- EPA designed this proposal so that facilities can comply without disrupting or delaying normal operations

EPA's Proposal for CO₂ Injection and GS Reporting: MRV Plans



- EPA did not propose to prescribe specific monitoring technologies
- Facilities conducting GS would develop and implement a site-specific MRV plan which would include:
 1. Assessment of Risk of Leakage
 2. Strategy to Detect and Quantify CO₂ Leakage to Surface
 3. Strategy for Establishing Pre-Injection Environmental Baselines at Surface
 4. Tailor Mass Balance Equation
- Once MRV plan is approved by EPA, the facility would implement it and begin collecting data for reporting to EPA

Public Comment



- 60-day public comment period
 - Public hearing held on April 19, 2010
 - “Open door” policy for listening sessions
 - Public comment period ended on June 11, 2010
- EPA received 16,300 comment submissions
 - Comments were predominantly supportive of the proposal
 - Many mass mailers supporting the proposal
 - Over 40 submissions with technical and policy recommendations

For More Information



- Information on the proposal and supporting background information is available electronically at: www.regulations.gov
 - Docket ID number is: EPA-HQ-OAR-2009-0926
- For additional information about this rulemaking, visit EPA's Web site at:
www.epa.gov/climatechange/emissions/subpart/rr.html